April 21, 2025

Matthew Botill

Division Chief, Industrial Strategies Division

California Air Resources Board

1001 I Street

Sacramento, CA 95814

RE: Comments on the Third 15-Day Changes to the Low Carbon Fuel Standard Amendments

Dear Mr. Botill:

I write on behalf of U.S. Venture and our subsidiary U.S. Energy regarding the Third 15-Day Modifications to the Low Carbon Fuel Standard (LCFS) regulation, released April 4, 2025. We appreciate the Board’s continued work to refine the rule and ensure its clarity and consistency with the Administrative Procedure Act. We urge CARB to swiftly finalize and implement the rule without further delay.

With more than 500 California employees, U.S. Venture is national provider of transportation energy, automotive tires, lubricants, and data insights that help fleet owners reduce fuel costs and emissions. As a marketer and distributor of renewable natural gas (RNG), U.S. Venture has participated in the LCFS program since 2013.

The current rulemaking has now spanned nearly three years and multiple iterations. While the process has benefited from significant public input and revision, prolonged uncertainty creates real consequences for companies like ours that deliver RNG to California. Continued delays in rule finalization impact both current projects and future development, particularly as LCFS credit markets remain sensitive to regulatory signals. Timely approval of the final amendments will provide developers with the regulatory certainty needed to proceed with confidence.

Therefore, we urge CARB to adopt the proposed final amendments and resubmit the package to the Office of Administrative Law within the statutory deadline.

Sincerely,

*s/Brian Casey*

Brian Casey

Head of Government Affairs

U.S. Venture / U.S. Energy